



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
1200 Sixth Avenue  
Seattle, WA 98101

February 17, 2006

Reply to  
Attn Of: AWT-107

Mr. Patrick A. Takasugi, Director  
Idaho State Department of Agriculture  
2270 Old Penitentiary Road  
P.O. Box 790  
Boise, Idaho 83701

RE: Assessment of Idaho's 2005 Agricultural Field Burning Program

Dear Mr. Takasugi:

This letter is EPA Region 10's assessment of the calendar year 2005 Idaho Agricultural Field Burning Program administered by the Idaho State Department of Agriculture (ISDA). We hope that our views combined with your own assessment, as well as input from tribal governments, participating growers, and the general public will help ISDA continue to improve the program. The goal is to ensure public health and the environment is protected while continuing to allow agricultural field burning under an effective management and permit program.

Two federal Clean Air Act regulatory changes will become important to Smoke Management Program implementation; proposed revised federal ambient air quality standards for particulate matter (PM<sub>2.5</sub>) and Regional Haze State Implementation Plan (SIP) development. We anticipate final action on the proposed revisions to the PM<sub>2.5</sub> standard in September of this year. We understand the Idaho Department of Environmental Quality (IDEQ) is currently working on a SIP revision to meet federal requirements for Regional Haze. You should consider these changes as you seek to improve the Smoke Management Program.

I believe the Smoke Management Program in Idaho has improved over the last few years as compared to the earlier voluntary program. The efforts of the State of Idaho, Coeur d'Alene Tribe, Nez Perce Tribe, and EPA to strengthen the program are encouraging. However, in our view, important issues remain and program improvements are still needed. A number of the issues identified below were raised in the past.

Every year is a challenge in the agricultural field burning arena and this year was no exception. As in previous years, wildfires brought complications to the program, as

did periods of unfavorable meteorology. Rising fuel costs created a significant and unexpected increase in requests to burn. Continued increases in non-farm population also present challenges for burn program managers and coordinators. These challenges will always be present and must be considered when making changes to the Smoke Management Program, including decisions about whether, when, and how field burning should continue. I would like to highlight areas needing significant improvement.

### **Improved Daily Burn Decisions:**

In spite of program improvements, adverse impacts from agricultural field burning smoke continued to occur. This was evident in the monitoring data, direct field observations, and the increased number of complaints. Even with heightened management oversight and burn coordinator attention, smoke intrusion into populated areas occurred on three days on the Rathdrum Prairie. Intrusions were also experienced in communities such as Grangeville. Many of these impacts occurred during a “conditional” burn forecast. It is critical to acknowledge these intrusions, conduct thorough investigations, and implement changes as needed for improved burn decisions

### **Alternatives to Fire:**

As noted above, population growth throughout Idaho is causing the expansion of communities into agricultural areas. This trend will continue to make agricultural field burning more difficult and requires either a more robust management system or increased use of alternatives to field burning. It is critical that Idaho increase research into alternatives to agricultural field burning. Developing economically viable alternatives will not only protect public health, but may also ensure sustainable production of these agricultural commodities.

### **Field Coordinator Development:**

A number of issues at the field coordinator level need to be addressed:

- An additional field coordinator is needed on the Camas Prairie near Grangeville.
- Continued training in interpreting and understanding meteorological conditions is needed, as is additional training in the use of burn decision tools such as MM5 and ClearSky. With increased training should come an increase in the use of these tools as part of the decision-making process.
- Local field coordinators need clear direction that burning should only occur when conditions are such that public health and welfare will not be adversely impacted
- Rigorous documentation should be required to support burn decisions and any changes to burn decisions.

### **Highway Safety:**

Standard protocols are needed regarding the use of flaggers whenever smoke could impact public roads. ISDA should work with local transportation and law

enforcement agencies on the development of these protocols and ensure growers are made aware of and adhere to them. This is an important safety issue that requires immediate resolution.

#### **Southern Idaho Program:**

Before the 2005 burn season, ISDA and others made a significant effort to provide outreach and training to growers in Southern Idaho. Unfortunately, participation in the voluntary program remains poor. We recognize there was a notable increase in registration and adherence to the program in 2005, but a large majority of growers still failed to comply with the program. EPA urges the State of Idaho to follow through on the initiative to expand the registration and penalty requirements statewide. This may be of growing import as the State develops and implements the program to meet the federal regional haze requirements.

#### **Outreach to the Public:**

EPA encourages ISDA to increase outreach to the public. The SMP participants make a concerted effort to maintain an open dialogue with the grower community and agricultural organizations. Similar efforts should be made with interested individuals, organizations and the public at large. Specifically, the public, including sensitive individuals or populations, need to receive accurate burn call information on a real time basis. Finally, feedback on what is or is not working and suggestions for improving the program should be solicited.

#### **Coordination and Communication with other agencies responsible for burn decisions:**

The last significant issue relates to coordination and communication with other state and federal agencies when making burn decisions. Smoke Management Plan participants have developed excellent protocols with some agencies such as the Idaho Department of Lands, and local fire agencies. However, coordination and information sharing between Idaho and the State of Washington, and between ISDA and state and federal agencies who conduct prescribed burning needs to be improved. An effective smoke management program must include open and reliable communication between all agencies involved in burn decisions affecting common airsheds.

EPA appreciates the efforts being made by the State of Idaho to implement an effective Smoke Management Program for crop residue disposal. This letter has focused on the more significant areas. As part of our ongoing working relationship, less critical issues will continue to be raised among the ISDA staff in Idaho, EPA and the Tribes.

We hope you will find these comments useful in improving the program and ensuring public health and the environment are adequately protected. Should you have any questions, please do not hesitate to contact me at 206-553-1234, or your staff may contact Doug Cole in the Idaho Office at 208-378-5764.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Ronald A. Kreizenbeck', with a large, stylized flourish at the end.

Ronald A. Kreizenbeck  
Deputy Regional Administrator

Cc:  
Chief J. Allan  
Rebecca Miles  
Toni Hardesty  
Jim Yost  
Karl Kurtz